



October 14, 2005

Via Electronic Filing

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

RE: IB Docket Nos. 05-220 and 05-221

Dear Ms. Dortch:

XM Radio Inc. ("XM") hereby files this letter in the above-referenced proceedings in which the Commission is considering how to assign returned spectrum in the 2 GHz band.¹ In its Comments, Sirius Satellite Radio Inc. ("Sirius") asked the Commission to reallocate this spectrum to the Satellite Digital Audio Radio Service ("SDARS") and to then assign all of this spectrum to Sirius.² To the extent the Commission decides to reallocate any of the returned spectrum to SDARS, the public interest requires the Commission to assign this spectrum on a pro rata basis between the two existing SDARS licensees, rather than simply handing all of this spectrum to Sirius without any rational basis for doing so.

Please contact the undersigned with any questions regarding this matter.

Very truly yours,

/s/William J. Bailey

William J. Bailey
Senior Vice President, Regulatory and
Government Affairs

cc: Donald Abelson
Bruce Franca
Roderick Porter
Steven Spaeth

¹ See *Public Notice*, FCC 05-133, IB Docket No. 05-220 (June 29, 2005); *Public Notice*, FCC 05-134, IB Docket No. 05-221 (June 29, 2005).

² See Comments of Sirius Satellite Radio Inc., IB Docket No. 05-221 (July 29, 2005), at 12, 14.